

MARGARET A. MOESER, Acting Chief
D. HUNTER SMITH, Trial Attorney
Money Laundering and Asset Recovery Section
Criminal Division
United States Department of Justice
1400 New York Avenue NW
Washington, DC 20005
Telephone: (202) 355-5705
Email: David.H.Smith@usdoj.gov

E. MARTIN ESTRADA
United States Attorney
MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division
JONATHAN GALATZAN
Assistant United States Attorney
Chief, Asset Forfeiture and Recovery Section
MAXWELL COLL (Cal. Bar No. 312651)
Assistant United States Attorney
1100 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-1785
Facsimile: (213) 894-0142
E-mail: Maxwell.Coll@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

REAL PROPERTY IN LOS ANGELES,
CALIFORNIA,

Defendant.

No. 2:22-cv-02902-JLS-PDx

**UNOPPOSED APPLICATION FOR LEAVE
TO FILE UNDER SEAL THE PARTIES'
STIPULATION AND REQUEST TO ENTER
CONSENT JUDGMENT OF FORFEITURE**

1 Pursuant to Paragraph 19 of the Court's standing order, the
2 government hereby applies for leave to file under seal the parties'
3 Stipulation and Request to Enter Consent Judgment of Forfeiture and
4 the proposed Consent Judgment of Forfeiture.

5 This unopposed application is based on the contemporaneously
6 filed declaration of Assistant United States Attorney Maxwell Coll
7 and the records and files in this case.

8 Dated: June 14, 2024

Respectfully submitted,

9 E. MARTIN ESTRADA
10 United States Attorney

11 MACK E. JENKINS
12 Assistant United States Attorney
Chief, Criminal Division

13 /s/ Maxwell Coll
14 MAXWELL COLL
Assistant United States Attorneys

15 Attorneys for Applicant
16 UNITED STATES OF AMERICA
17
18
19
20
21
22
23
24
25
26
27
28

Declaration of AUSA Maxwell Coll

I, Maxwell Coll, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys representing the government in this case.

2. On or around June 11, 2024, the United States and Claimants WRH, Inc., Gurgun Khachatryan, and Artyom Khachatryan ("Claimants," and together with the United States, the "Parties"), executed a stipulation ("Stipulation") requesting that the Court enter a proposed Consent Judgment of Forfeiture ("Proposed Consent Judgment"), which is dispositive of this action.

3. As set forth in Paragraph 14 of the Stipulation, the Parties request that the Court retain jurisdiction to enforce the terms of the Stipulation and Proposed Consent Judgment.

4. Pursuant to the Paragraph 19 of the Court's standing order ("Settlement of Civil Cases"), the government seeks leave to file the Stipulation and Proposed Consent Judgment under seal for the Court's review. Claimants do not oppose this application.

5. The Parties jointly request that--should the Court grant this Application and the Proposed Consent Judgment--the Stipulation, Proposed Consent Judgment, and approved Consent Judgment be filed on the public docket.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed in Los Angeles, California, on June 14, 2024.

/s/ Maxwell Coll

AUSA Maxwell Coll